| Mary E. Bacon, NV Bar No. 12686 SPENCER FANE LLP | |
|--|--|
| 300 South Fourth Street, Suite 950 | |
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| Facsimile: (702) 408-3401 mbacon@spencerfane.com | |
| Attorneys for Defendant Genesis FS Card Services, Inc. | |
| Genesis 1'5 Cara Services, Inc. | |
| | |
| UNITED STAT | TES DISTRICT COURT |
| DISTRI | CT OF NEVADA |
| William Kearnes, | Case No.: 2:22-cv-01333-APG-DJA |
| Plaintiff, | Case 110 2.22-ev-01333-711 G-D371 |
| , , , , , , , , , , , , , , , , , , , | |
| V. | JOINT MOTION FOR EXTENSION OF TIME |
| Equifax Information Services, LLC, Experian Information Solutions, Inc., | FOR DEFENDANT GENESIS FS CARD SERVICES, INC. TO FILE ANSWER OR |
| Capital One Bank (USA N.A. and Genesis FS Card Services, Inc., | OTHERWISE RESPOND |
| Defendants. | FIRST REQUEST |
| Defendants. | |
| | |
| | s, Inc. ("Genesis") has requested an extension of time |
| to answer, move or otherwise respond to the | e Complaint of Plaintiff William Kearnes ("Plaintiff"), |
| to which Plaintiff has no objection Pursua | ant to Local Rule IA 6-1, it is hereby stipulated and |
| agreed to by and among the undersigned cou | unsel that Genesis's time to answer, move or otherwise |
| respond to the Complaint is extended from S | September 12, 2022, to and including October 3, 2022. |
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| <i>III</i> | - 1 - |

MOTION FOR EXTENSION AND PROPOSED ORDER Case No.: 2:22-cv-01333-APG-DJA

| 1 | This additional time is needed to investigate Plaintiff's claims and Genesis's defenses and | | |
|----|---|---|--|
| 2 | explore the possibility of resolving this matter without further litigation. This is the first motion | | |
| 3 | for an extension of time for Genesis to answer or otherwise respond to Plaintiff's Complaint. | | |
| 4 | | | |
| 5 | Dated: September 9, 2022 | By: /s/ Mary E. Bacon | |
| 6 | | Mary E. Bacon, NV Bar No. 12686 SPENCER FANE LLP | |
| 7 | | 300 South Fourth Street, Suite 950 Las Vegas, NV 89101 | |
| 8 | | Phone: (702) 408-3400 Fax: (702) 408-3401 | |
| 9 | | mbacon@spencerfane.com | |
| 10 | | Attorneys for Defendant Genesis FS Card Services, Inc. | |
| 11 | | NO OPPOSITION | |
| 12 | September 9, 2022 | By: /s/ Michael Kind | |
| 13 | | Michael Kind, NV Bar No. 13903 KIND LAW | |
| 14 | | 8860 South Maryland Parkway, Suite 106 Las Vegas, NV 89123 | |
| 15 | | Phone: (702) 337-2322 Fax: (702) 329-5881 | |
| 16 | | mk@kindlaw.com | |
| 17 | | Attorneys for Plaintiff | |
| 18 | | | |
| 19 | | IT IS SO ORDERED | |
| 20 | | IT IS SO ORDERED: | |
| 21 | | | |
| 22 | | United States Mag strate Judge | |
| 23 | | Dated: September 12, 2022 | |
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CERTIFICATE OF SERVICE I hereby certify that a true and correct copy of the foregoing documents has been served this 9th day of September 2022, via the Court's CM/ECF system, upon all counsel of record as follows: Michael Kind, Esq. KIND LAW mk@kindlaw.com George Haines, Esq. FREEDOM LAW FIRM ghaines@freedomlegalteam.com By: <u>/s/ Mary E. Bacon</u> Mary E. Bacon, NV Bar No. 12686 Attorneys for Defendant Genesis FS Card Services, Inc.

> MOTION FOR EXTENSION AND PROPOSED ORDER Case No.: 2:22-cv-01333-APG-DJA